

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.)
) CRIMINAL NO. 04-10306-PBS
TREVOR CHARLTON)
)

DEFENDANT'S REQUESTED
VOIR DIRE OF PROSPECTIVE JURORS

Defendant, Trevor Charlton, respectfully moves, pursuant to Fed. R. Crim. P. 24(a), that in an effort to obtain a fair and impartial jury, this Court utilize the juror questionnaire (only two questions) which addresses racial bias or prejudice. Exhibit A. In support of this request, see affidavit of counsel.

Exhibit B.

The defendant further moves that this Court ask the following general questions of the venire then follow up with individual questioning of the venire where warranted based on juror's answers to the questionnaire and to this Court's general questions.

1. The government claims that on July 25, 2004 in Brockton Mr. Charlton was in possession of a semi-automatic handgun. Do you have any reaction to the allegations that might make it difficult for you to be fair or impartial in this case?
2. Do you think the fact that this case involves guns might make it difficult for you to evaluate the evidence in this case fairly and impartially?
3. Mr. Charlton is charged with illegally possessing a gun after having been previously convicted of a crime carrying a possible term of imprisonment of more than one year. Is there anything about this charge that makes you question your ability to be fair and impartial in listening to the evidence in this case?

4. Would you give the testimony of a police officer more weight than that of any other witness?
5. Have you, your spouse or any member of your family, ever been a victim of crime?
6. Do you have any relatives who are members of any police force, law enforcement agency, prosecutor's office or security agency?
7. Have any newspaper articles, television reports, or media coverage about crime, shootings, violence, or firearms affected you in a way which might make it difficult for you to decide this case solely upon the evidence produced at trial?

TREVOR CHARLTON
By his attorneys,

/s/ J. Martin Richey
J. Martin Richey
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/s/ Catherine K. Byrne
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